

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**IBE TRADE CORP., a Delaware corporation,
and ALEXANDER ROVT,**

Plaintiffs,

v.

**ALEXANDER ANATOLYEVICH DUBINSKY and
TELERADIOKOMPANIA “STUDIA 1+1”,
a Ukrainian limited liability company,**

Defendants.
-----X

Case No. 1:20-cv-01666 (MKV)

**STIPULATION AND ORDER EXTENDING TIME OF DEFENDANT
TELERADIOKOMPANIA “STUDIA 1+1” TO RESPOND TO PLAINTIFFS’ COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by and between counsel for Plaintiffs and counsel for Defendant Teleradiokompania “Studia 1+1” as follows:

1. On or before July 9, 2020, counsel for Defendant Teleradiokompania “Studia 1+1” shall inform counsel for Plaintiffs whether he agrees to waive any defenses as to sufficiency of process and/or service of process of Plaintiffs’ Summons and Complaint.
2. The time for Defendant Teleradiokompania “Studia 1+1” to answer or otherwise respond to Plaintiffs’ Complaint shall be extended from June 18, 2020 (assuming service of process was effectuated on May 28, 2020) to August 18, 2020.
3. This Stipulation is made without prejudice to and waiver of Defendant Teleradiokompania “Studia 1+1”’s defenses of lack of sufficiency and service of process, personal jurisdiction, *forum non conveniens*, or any other applicable jurisdictional defenses.

MCDERMOTT WILL & EMERY LLP

ARNALL GOLDEN GREGORY LLP

By: /s/ Neil A. Capobianco
Neil A. Capobianco

By: /s/ Richard J. Oparil
Richard J. Oparil (RO9269)

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*Attorneys for Defendant
Teleradiokompania "Studia 1+1"*

SO ORDERED:

U.S.D.J. Dated: _____